

April 28, 2017

VIA ELECTRONIC SUBMISSION

Clerk of the Board, Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Proposed Amendments to the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions

The Wonderful Company LLC (“Wonderful”), on behalf of Wonderful Pistachios and Almonds LLC (“WPA”), welcomes the opportunity to provide comments to the California Air Resources Board (“ARB”) regarding the proposed amendments to the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions (“Proposed Regulations”), released on April 13, 2017.

Wonderful appreciates ARB staff taking the comments of industry into consideration during the most recent amendment process. While we are generally pleased with the proposed amendments, we respectfully request that ARB consider maintaining the previously established verification and reporting deadlines under section 95103(f) (Greenhouse Gas Reporting Requirements). Changing the verification deadline from September 1 to August 10 of each year will cause unnecessary challenges for verifiers and covered entities alike. Pushing up the date will only cause there to be less time for the parties to work together to ensure data is accurate and complete, while providing no significant benefit to the Cap-and-Trade program. For this reason, we recommend that ARB leave the September 1 verification date, as proposed in previous versions of the regulation.

Wonderful remains committed to working with ARB to further refine the Proposed Regulations to ensure the final regulations advance California’s air quality goals while providing fair and appropriate requirements on businesses consistent with the intent of the law. Thank you for your consideration of these comments. We would be happy to discuss at your convenience.

Sincerely,

A handwritten signature in black ink, appearing to be 'M Poole', with a stylized, flowing script.

Melissa Poole
Senior Counsel/Director of Government Affairs